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"Watershed Approach" - *EPA Inspector General Calls for greater use* - The U.S. Environmental Protection Agency's Office of Inspector General has recommended that the Agency do a better job of integrating the "watershed approach" into its core water quality programs. The premise of the watershed approach is that many water quality problems are best solved at the watershed level rather than the individual waterbody or discharger level. The OIG's report notes that the approach has only gained "limited acceptance as a means to implement water programs." For example, the State Water Resources Control Board (SWRCB) and the Regional Boards issue National Pollutant Discharge Elimination System permits (NPDES) to point source dischargers. Currently, these permits are issued to individual dischargers. They could theoretically be issued on a watershed basis, but shifting to a watershed basis would require additional resources.

Another example is the TMDL program. TMDLs identify the maximum amount of a pollutant a waterbody can receive from all sources and still meet water quality standards. Most TMDLs currently tend to focus on one or a few pollutants and on a waterbody segment. A watershed TMDL would address a larger geographical scale and possibly more or all the pollutants causing impairment. This, of course, would likely require a longer TMDL development time and possibly greater initial funding. Shifting to a watershed TMDL might also mean that the EPA and State would not meet the deadlines for TMDL development imposed in some areas by court consent decrees. On the other hand, a watershed TMDL might avoid problems where controls implemented for initial TMDLs may not be compatible with controls needed for later TMDLs. For example, the trash controls currently being constructed on the LA River and Ballona Creek may not be compatible with the needed controls for later TMDLs for metals, bacteria, and toxicity. One of the reasons that the State Water Resources Control Board rejected the San Francisco Bay mercury TMDL was that it did not adequately take into account the watershed inputs of mercury from outside the immediate Bay area. OIG report: http://www.epa.gov/oig/reports/2005/2005/921-2005-P-00025.pdf

Delta Ecology – *Fish declines raise alarms* – The San Francisco Bay-Delta food web is showing a sudden and significant top-to-bottom decline. Plankton counts are down as well as the number of smelt, shad, and striped bass. Smelt are at the lowest levels recorded since surveys began in 1967. The causes are unknown but may include a combination of agricultural runoff, increased exports of Delta water, toxic exotic algae, and invasive species such as the Asian clam, which has achieved extremely high densities and reduces the food sources for other species. Salmon runs, however, are doing better. http://www.estuarynewsletter.com/2005_06/cover.php Also see: http://www.contracostatimes.com/mld/cctimes/news/12813750.htm

Secretary for Resources Mike Chrisman has said, "The threat facing the delta smelt could be a threat that impacts the entire health of the ecosystem." The state recently released the *Delta Smelt Action Plan*: http://www.publicaffairs.water.ca.gov/newsreleases/2005/10-20-05deltasmelt.cfm

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